

1 BARRY J. PORTMAN
2 Federal Public Defender
3 JOHN PAUL REICHMUTH
4 Assistant Federal Public Defender
5 555 - 12th Street
6 Suite 650
7 Oakland, CA 94607-3627
8 Telephone: (510) 637-3500

9 Counsel for Defendant JOHNSON

10

11

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

14

15 UNITED STATES OF AMERICA,) No. CR-07-00488 CW
16 vs.)
17 Plaintiff,) **STIPULATION AND ORDER
18**) **CONTINUING STATUS HEARING**
19 ANDRE MATTHEWS, et al.) Hearing Dates: March 12 & 19, 2008
20) Requested Date: April 9, 2008
21 Defendant.)
22 _____)

23

24

25

26

27 It is hereby stipulated that the STATUS/CHANGE OF PLEA hearing date of March 12,
28 2008 and the MOTIONS hearing date of March 19, 2008 be continued to April 9, 2008 at 2:00
29 p.m. for CHANGES OF PLEA OR MOTIONS. In addition, the parties stipulate and agree that
30 time should be excluded between March 12, 2008 and April 9, 2008 due to the ongoing
31 investigation by defense counsel. Two new discs of electronic discovery have been produced by
32 the government within the week of March 3, 2008, and defense counsel need time to review this
33 material. Approximately 4000 pages of discovery have been previously been produced to
34 defense counsel in electronic form. This electronic discovery has been converted to OCR
35 searchable form by defense counsel and distributed to all defense counsel.

1 The parties agree that the ends of justice served by the continuance requested herein
2 outweigh the best interest of the public and the defendants in a speedy trial because the failure to
3 grant the continuance would deny the counsel for the defendant the reasonable time necessary
4 for effective preparation, taking into account the exercise of due diligence. Time should
5 therefore be excluded pursuant to 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv).

6

7 || 03-07-08
Date

/s/
John Paul Reichmuth
Assistant Federal Public Defenders
Counsel for defendant Johnson

10

11 | 03-07-08
Date

/s/
Richard Tamor
Counsel for defendant Bacon

13

1.4 Date

/s/

15

16 || Date

/s/
Gail Shifman
Counsel for defendant Kautzman

17

18 | 03-07-08
Date

/s/
John Hemann
Counsel for defendant Matthews

8

Date

Laura Robinson
Counsel for defendant Enriquez

22

03-07-08
Date

/s/
Mark Goldrosen
Counsel for defendant Reyes

25

05-07-08
Date

/s/
Seth Chazin
Counsel for defendant Williams

1
2 03-07-08
Date

/s/
Ismail Ramsey
Counsel for defendant Arnold

3
4 03-07-08
Date

/s/
Diana Weiss
Counsel for defendant Green

5
6 03-07-08
Date

/s/
Keslie Stewart
Assistant United States Attorney

9 I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/)
within this efiled document.

10 _____
/S/ John Paul Reichmuth
Counsel for Defendant Alicia Johnson

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

ORDER

Based on the reasons provided in the stipulation of the parties above, the Court hereby finds that the ends of justice served by the continuance requested herein outweigh the best interest of the public and the defendant in a speedy trial because the failure to grant the continuance would deny the counsel for the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court makes this finding because the parties continue to investigate the new discovery, which is voluminous.

Based on these findings, IT IS HEREBY ORDERED THAT the STATUS/CHANGE OF PLEA hearing date of March 12, 2008 and the MOTIONS hearing date of March 19, 2008 be continued to April 9, 2008 at 2:00 p.m. for CHANGES OF PLEA OR MOTIONS and that time be excluded from March 12, 2008, to April 9, 2008, pursuant to 18 U.S.C. §§3161 (h)(8)(A) and (B)(iv).

IT IS SO ORDERED.

3/11/08

Claudia Wilken

Date

Hon. Claudia Wilken
United States District Judge